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5 **UNITED STATES DISTRICT COURT**
6 **DISTRICT OF NEVADA**
7 -oo-

8 UNITED STATES OF AMERICA,)
9 Plaintiff,) No. 2:17-mj-0865-PAL
10 v.)
11 VICTOR NAVARRO,)
12 Defendant.)
13

MOTION TO RETURN PASSPORT

12 COMES NOW the United States of America, by and through STEVEN W. MYHRE,
13 Acting United States Attorney, and Susan Cushman, Assistant United States Attorney, and files this
14 motion requesting that the Court direct Pretrial Services to return defendant Navarro's passport for the
15 reasons stated below.

16 i) On August 22, 2017, the defendant was arrested in the captioned matter. The
17 defendant made his initial appearance on August 23, 2017, and was released on conditions. (ECF #
18 5). As a condition of his release, the defendant surrendered his passport to Pretrial Services.

19 ii) On September 6, 2017, the government moved to dismiss the criminal complaint in
20 the captioned matter (ECF # 14). The government's motion was granted that same day. (ECF # 16).

21 iii) The defendant's passport should be returned to him given that there are currently
22 no pending charges in the District of Nevada.

23 iv) Rachel Korenblat, A.F.P.D., counsel for the defendant, agrees with the captioned
24 motion.

1 WHEREFORE, the United States requests that this Court direct pretrial services to
2 return the defendant's passport.

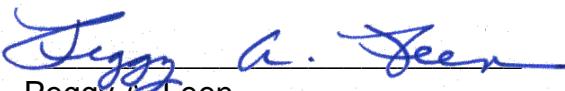
3 DATED this 21st day of September, 2017.

4 Respectfully Submitted,

5 STEVEN W. MYHRE
6 Acting United States Attorney

7 /s/ Susan Cushman
8 SUSAN CUSHMAN
9 Assistant United States Attorney

10 **IT IS SO ORDERED** this 26th day
11 of September, 2017.

12 
13 Peggy A. Leen
14 United States Magistrate Judge

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1 **CERTIFICATE OF ELECTRONIC SERVICE**

2 This is to certify that the undersigned has served counsel for Defendant with the foregoing by
3 means of electronic filing.

4 Dated this 21st day of September, 2017

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6 _____
7 */s/ Susan Cushman*
8 SUSAN CUSHMAN
9 Assistant United States Attorney

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